



May 2022

"Longacres", Winslow Road, Granborough, Buckinghamshire

Rural Worker's Dwelling Appraisal

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1 Introduction and Instructions

- 1.1 Reading Agricultural Consultants (RAC) is instructed by Peter and Elaine Rowe (the applicants) to prepare a report setting out the actions and activities that they have undertaken at their property known as “*Longacres*”, Winslow Road, Granborough in the development of an equestrian business. It is intended that this report will accompany a planning application for the renewal of temporary permission for residential accommodation so that they can continue to develop the business and provide for the welfare needs and security of the horses in their charge.
- 1.2 As is described in more detail in the report, the development of the holding began following the grant of planning permission for a “*change of use of land to equestrian use on a commercial basis, siting of temporary rural workers dwelling, erection of agricultural storage building and horse walker*” on 22nd November 2018¹. The plan was - and is - to develop an equestrian enterprise for the care and rehabilitation of horses allied to a small livery business.
- 1.3 Reading Agricultural Consultants prepared the business plan and appraisal that was submitted with the application in 2018 that set out how a viable and sustainable equestrian business could be developed over the following three years. It was proposed that as the business was developed the applicants’ daughter (Nicola Seagrove²) would cease employment with the Post Office to develop the yard at Granborough.
- 1.4 However, the business has not developed as envisaged due to:
- a slow start to the development³;
 - adverse health issues with:
 - a pregnancy in 2019 followed by a difficult birth and maternity leave till November 2020;
 - hospitalisation with operation and recuperation due to hernia resulting in inability to undertake physical work until November 2021;
 - the nationally imposed Covid-19 lockdowns leading to:
 - a lack of demand for new livery clientele, and

¹ 18/03034/APP

² Nicola is qualified with British Horse Society Stage 2 and 3 qualifications

³ Finally moved the mobile home onto the land in March 2019, planning condition requiring landscaping and moving the gates to be executed, delay in installing the horse walker - completed December 2020, etc.

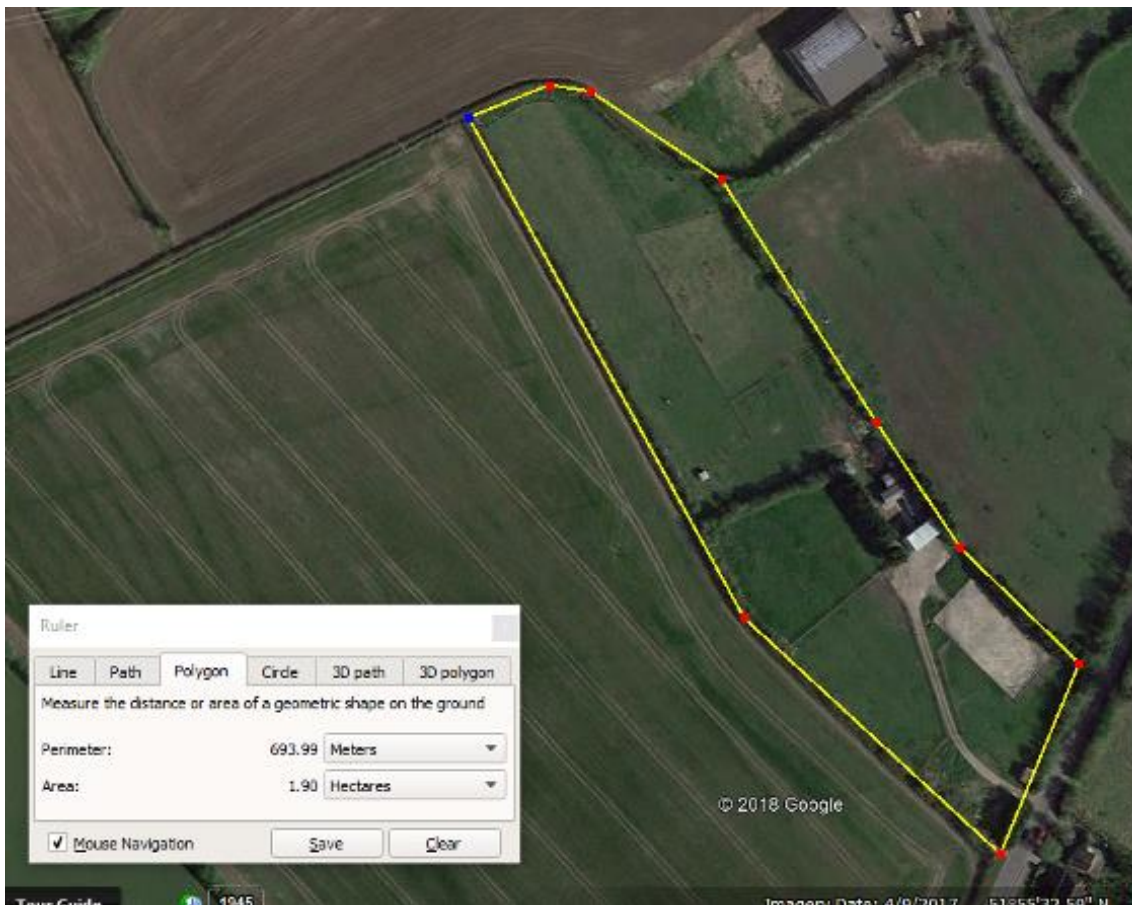
- the cessation of racing resulting in no recuperation requests/requirements.

1.5 The applicants with their daughter, are still intent on developing the business on the land they own but need to live on site to provide the essential care for the horses. Thus, they are seeking a further period of temporary residential permission to get the business started and running properly.

1.6 This report has been prepared by Peter Williams who prepared the appraisal in 2018. Peter is an agricultural and rural planning consultant with over 30 years' experience of preparing assessments of planning applications for new dwellings in the countryside. He is an Associate (and former Director) of Reading Agricultural Consultants and holds an Honours Degree in Agriculture from the University of Reading; he is a Fellow of the British Institute of Agricultural Consultants. Throughout his professional career, he has been engaged by farmers and local planning authorities to appraise a wide range of enterprises in the context of planning applications for new rural workers' dwellings.

2 Background

- 2.1 The physical details for this application are identical to those submitted in 2018 with the application for the temporary dwelling.
- 2.2 *Longacres* extends to 1.9ha (4.7 acres) and is laid to pasture. The property has an existing stable block with 5 stables and a barn to the fore that is used for storing hay and equipment. There is also an outdoor sand school measuring some 40m x 20m. The whole of the property is fenced with materials suitable for horses and is supplied with water to field troughs and electricity.



- 2.3 Since the grant of planning permission in 2018 the applicants have developed the unit including the construction of a further (permitted) barn and the installation of a mechanical horse-walker. This was (finally) commissioned in 2020 and provides an all-weather exercise facility for recuperative horses – essential in the management of musculo-skeletal treatments. The stables have also been renovated.
- 2.4 As the majority of the horses will be managed on a recuperative (stabled) regime access to land for exercise/grazing is kept to a minimum, and the “normal” land area requirement of 0.5ha per horse is not relevant. In due course, should additional land be required, local land owners have already intimated the availability of land for rent, but for the meantime this is not necessary.



2.5 Subject to the grant of further period of permission, over the next three years the applicants are intent on developing the site with 12 stables (5 existing, 5 in the new barn, and a further 2 as wooden field stables) and provide full-livery rehabilitation services (the budgets assume 60% occupancy rates @ £200/week). Two of the stables will be used for full-livery horses with an occupancy rate of 80% at £160 per week. (The precise mix of rehabilitation/livery horses will vary depending on uptake).

2.6 For comparison purposes the following weekly livery rates are being advertised in May 2022:

Shardeloes, Amersham	£195.00 - £318.50
Silverdown Stables, Harwell	£117.50 - £128.75
Upper Farm, Chinnor	£144.50 – £266.00

2.7 It is still intended that the labour and management will be provided by Nicola with additional labour employed as the business is developed. Assistance will also be provided by her parents, as required.

2.8 But, in order to be able to develop the business properly there is a need for a further period of temporary accommodation so that Nicola can live close to, and monitor properly, the horses on the unit.



3 Relevant Policies and Guidance

- 3.1 A detailed commentary of the planning policies against which this application will be examined is set out in the Planning Statement.
- 3.2 Development control policies are set out in the Vale of Aylesbury Local Plan (September 2021). Policy H3 sets out tests to assist in the examination of applications for rural workers' dwellings noting (for rural workers' temporary dwellings):

"All new dwellings for an agricultural, forestry or rural worker will only be permitted if all of the following criteria are met:

- a. The need relates to a full-time worker (someone employed to work solely or mainly in the relevant occupation) and does not relate to a part-time requirement*
- b. There is a functional need for a worker to live at, or in the immediate vicinity of, their place of work (considering the requirements of the activities, operations and security of the enterprise and not personal preferences or circumstances). For a temporary dwelling, the need is essential to support a new rural business activity and for a permanent dwelling, there is an essential existing functional need. By itself, the protection of livestock from theft or injury by intruders does not establish need, nor do requirements arising from food processing or agricultural contracting, and nor does a retirement home for a former farmer. Conventional methods of forestry management are unlikely to give rise to an essential functional need.*
- c. The functional need could not be fulfilled by any other means. For example, applicants will need to demonstrate why agricultural, forestry or other essential rural workers could not live in nearby towns or villages, or make use of accommodation already existing on the farm, area of forestry or business unit. Where applicable, the council will take into account the Town and Country Planning (General Permitted Development)(England) Order 2015 Schedule 2 Part 3 Class Q for changes of use from agricultural buildings to dwellings.*
- d. It is sited so as to meet the identified functional need and is related to existing farm, forestry or rural business buildings, or other dwellings where these exist on or adjacent to the unit for which the functional need has been established.*
- e. Suitable accommodation has not been sold separately from the land within the last five years, including that which might have been converted Temporary rural workers'*

dwellings The council will not normally give temporary permission in a location where a permanent dwelling would not be permitted.

New temporary dwellings for an agricultural, forestry or rural worker will only be permitted if all of the following additional criteria are also met:

- f. The future economic viability of the enterprise to which the proposed dwelling relates can be demonstrated by a sound business plan. This should demonstrate that the proposed enterprise has been planned on a sound financial basis with a reasonable prospect of delivering a sustainable profit before or by the expiry of the temporary period that the proposal seeks to secure. Vale of Aylesbury Local Plan 187*
- g. it takes the form of a caravan, a wooden structure, or other temporary accommodation of the minimum size required to support the proposed new rural business activity.*

The council will not normally grant extensions to a temporary permission over a period of more than three years. If permission for a permanent building is subsequently sought, the merits of the proposal will be assessed against the criteria in this policy relating to permanent occupational dwellings in the countryside”.

3.1 The policy is in line with the national guidance provided in the (revised) National Planning Policy Framework (NPPF). The NPPF is all about sustainable development. Paragraph 7 states:

“...The purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs”.

3.2 Paragraph 11 sets out the core land-use planning principles that should be adopted, and these expressly include *inter alia*:

- a presumption in favour of sustainable development;*
- positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;*
- provide for objectively assessed needs for housing and other uses;*
- approving development proposals that accord with an up-to-date development plan without delay; and,*

- *where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission...*

3.3 Paragraph 38 requires that decision makers:

- *should approach decisions on proposed development in a positive and creative way;*
- *work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area;*
- *seek to approve applications for sustainable development where possible.*

3.4 Paragraph 79 deals with housing in the countryside and notes:

“To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby”.

3.5 Paragraph 80 seeks to maintain the presumption against isolated new dwellings in the countryside unless they are essential, noting:

“Planning policies and decisions should avoid the development of isolated homes in the countryside unless one or more of the following circumstances apply:

- a) there is an essential need for a rural worker, including those taking majority control of a farm business, to live permanently at or near their place of work in the countryside...”.*

3.6 Further guidance on the NPPF is provided in the Planning Practice Guidance. The updated text relevant to paragraph 80, published in July 2019, states:

“Considerations that it may be relevant to take into account when applying paragraph 79a of the NPPF could include:

- *evidence of the necessity for a rural worker to live at, or in close proximity to, their place of work to ensure the effective operation of an agricultural, forestry or similar land-based rural enterprise (for instance, where farm animals or agricultural processes require on-site attention 24-hours a day and where otherwise there would be a risk to human or animal health or from crime, or to deal quickly with emergencies that could cause serious loss of crops or products);*

- *the degree to which there is confidence that the enterprise will remain viable for the foreseeable future;*
- *whether the provision of an additional dwelling on site is essential for the continued viability of a farming business through the farm succession process;*
- *whether the need could be met through improvements to existing accommodation on the site, providing such improvements are appropriate taking into account their scale, appearance and the local context; and*
- *in the case of new enterprises, whether it is appropriate to consider granting permission for a temporary dwelling for a trial period.*

Employment on an assembly or food packing line, or the need to accommodate seasonal workers, will generally not be sufficient to justify building isolated rural dwellings”.

3.3 The remainder of this report assesses the application against the requirements of the above national and local policies, using the Policy H3 tests as a guide.

4 Appraisal

4.1 The plan remains to develop an equestrian yard with twelve stables and a mechanical horse walker, with associated equipment including solarium and spa facilities to be able to cater for rehabilitation cases. Full livery will also be offered.

The need relates to a full-time worker and does not relate to a part-time requirement;

4.2 The issue of a full-time worker was accepted in 2018 at the time of the temporary planning permission. Insofar as nothing has changed the same need will persist.

4.3 The labour required to run a livery yard can be assessed with reference to standard data such as that provided in the recently updated *Equine Business Guide, 7th Edition* published in association with Warwickshire College.

	SMD/hd (ha)	Enterprise size	Total
Full livery horses	83	12	598 ⁴
Grassland management	0.4	5	2
Subtotal			600
Management and maintenance (15%)			90
Total			690

4.4 The table above uses the standard labour figures for horses reduced by 40% to reflect economies of scale. This approach is endorsed in the *Equine Business Guide* which states:

“It does not necessarily take double the amount of time to care for two horses as it does for one. Therefore, economies of scale are applied to the labour requirements:

<i>Number of horses</i>	<i>1</i>	<i>2-5</i>	<i>6-10</i>	<i>11-20</i>	<i>21+</i>
<i>Reduce standard by:</i>	<i>0%</i>	<i>25%</i>	<i>30%</i>	<i>40%</i>	<i>50%</i>

4.5 This estimate of 690 standard man days is equivalent to the labour provided by 2.3 full-time workers (normally assumed to provide 300 SMDs) and demonstrates that this enterprise does require a full-time worker.

⁴ Includes a 40% reduction for economies of scale

4.6 For the purposes of budgeting it is assumed that the labour requirement - over and above one full-time worker, and which will incur an additional cost - will be:

	Enterprise size		
	Year 1	Year 2	Year 3
Full livery horses	3 horses (249 SMD)	6 horses (350 SMD)	12 horses (598 SMD)
Grassland management	2	2	2
Subtotal	251	352	600
Management (15%)	38	53	90
Total	289	405	690
Full-time workers	1.0	1.4	2.3
Additional workers	0	0.4	1.3

It is essential to support a new rural business activity for which there is a clearly established functional need for the worker to live on or in the vicinity of the holding

4.7 The issue of essential need was accepted in 2018 at the time of the temporary planning permission. Insofar as nothing has changed the same need will persist.

4.8 Legislation requires that animals are managed in a manner which accords them freedom from thirst, hunger and malnutrition; appropriate comfort and shelter; the prevention, or rapid diagnosis and treatment of injury, disease or infestation; freedom from fear; and freedom to display most normal patterns of behaviour. It is accepted that, without good stockmanship, animal welfare can never be adequately protected.

4.9 Those keeping and caring for livestock are governed by legal requirements, such as the Animal Welfare Act, 2006; the Welfare of Farmed Animals (England) Regulations 2007; and industry-adopted Codes of Recommendations for the welfare of livestock. These all require that the welfare and safety of livestock is proactively managed to ensure their proper management is assured.

4.10 Fundamentally, livestock should “enjoy” 5 basic freedoms:

- **Freedom from hunger and thirst** - by ready access to fresh water and a diet to maintain full health and vigour;
- **Freedom from discomfort** - by providing an appropriate environment including shelter and a comfortable resting area;

- **Freedom from pain, injury or disease** - by prevention or rapid diagnosis and treatment;
- **Freedom to express normal behaviour** - by providing sufficient space, proper facilities and company of the animals' own kind;
- **Freedom from fear and distress** - by ensuring conditions and treatment to avoid mental suffering.

4.11 In 2009 the equestrian industry and welfare organisations updated guidelines⁵ for the welfare of all horses, ponies and donkeys. This refers to the availability of staff and states at paragraph 4 that:

“Sufficient staff must be provided at all times to ensure proper, regular and timely attention to all horses held”.

4.12 Having staff on site is essential to provide 24-hour supervision for:

- the close management and daily requirements of horses boxed in the 12 stables (including those in for rehabilitation);
- the taking to grass and back to the stables at night for all the horses on full-livery;
- provision of security for animals from theft or malicious attack; and,
- dealing with unforeseen emergencies.

4.13 Horses should be inspected regularly for signs of illness, distress or injury, and equestrian establishments have a duty of care to ensure the rapid diagnosis and treatment of injury, disease or infestation. Unforeseen incidents can cover a wide range of situations, from dealing with emergencies such as a horse cast in its box or a horse with colic, to damage to the stables and associated buildings from the horses, severe weather conditions or even fire. Added to this are the veterinary needs of recuperative horses where regular and routine examination of horses is essential, with medication provided at regular intervals, or bandages changed as required. The welfare and treatment needs of such horses is considerably higher than for horses in good condition and it is primarily for these horses that an on-site presence is essential.

4.14 In addition, it is intended that others' horses will be left at the yard and there is an essential need to live on site simply to provide for the care of these animals. Quite apart from the medicinal and care needs of the horses - which should not be underestimated - there is a requirement to

⁵ Equine Industry Welfare Guidelines Compendium for Horse, Ponies and Donkeys; National Equine Welfare Council: 3rd Edition, 2009

ensure the safety of third party horses - where the Duty of Care for the animals vests with the applicant.

4.15 Such issues have been examined at appeal on numerous occasions and appeal extracts from the below were provided with the 2018 application. They are not repeated (for the sake of expediency, but can be provided). They included:

- **Parklands Farm, Pennypot Lane, Chobham, Surrey GU24 8DJ**⁶ application for residential accommodation to provide for the supervisory needs of 8 polo ponies.
- **Land at Birch Tree Farm, Burns Close, Callerton, Newcastle upon Tyne**⁷ appeal for residential accommodation to support 14 liveried horses.
- **Thorneylee Stables, Canons Ashby, Daventry, NN11 3SD**⁸ full-time professional livery with 10 stables allied to horse breeding.

4.16 As previously accepted - it is clear that there will be an essential need for an equestrian worker to be resident on site at *Longacres* to ensure the welfare needs of the horses are not compromised. Workers living off site are unable to provide the necessary and essential level of care and scrutiny. The use of CCTV can be a useful management aid, but cannot replace the 24-hour eyes and ears of an on-site, resident worker.

4.17 The enterprise will also provide benefits to the local economy by using local farriers; purchasing horse feed from local feed merchants; and using the local veterinary practice.

The future economic viability of the enterprise to which the proposed dwelling relates can be demonstrated by a sound business plan

As previously, it is requested that the budgetary detail is NOT published, as the details are commercially sensitive.

4.18 The issue of future economic viability was accepted in 2018 at the time of the temporary planning permission.

4.19 Clearly the financial models advanced have not been realised - for the reasons outlined - but the plan remains entirely achievable. For avoidance of doubt the figures are changed from the 2018

⁶ APP/D3640/A/08/2070667 all decisions can be provided, if required – but were provided in 2018

⁷ APP/M4510/C/10/2137823 and 2137831

⁸ APP/Y2810/W/17/3184583

models with the removal of most of the viable costs for recuperative (or liveried) horses (feed, bedding, vet fees, farrier, etc) as these are covered by the owners of the horses.

4.20 In terms of business costs these are effectively restricted to the fixed costs of “running” the buildings and growing the grass as all of the variable costs associated with keeping The budgets are based broadly on published data in the *Equine Business Guide, 6th Edition*, adjusted for local prices – with limited variable costs. The budgets indicate:

		Year 1	Year 2	Year 3
Rehabilitation income @£200/wk	1	15,600	31,200	62,400
Livery income @£160/wk	1	3,328	6,656	13,312
Total Income		18,928	37,856	75,712
Variable Costs		764	1,528	3,057
GROSS MARGIN		18,164	36,328	72,655
Fixed Costs	2	9,072	10,206	11,840
(of which purchased labour)	3	-	8,320	27,040
Estimated Net Profit		9,092	17,802	33,775

Note 1: Assumes 10 rehabilitation stables, 2 full livery.

25 percent take up in Year 1, 50% in Year 2, 100% take up in Year 3.

Annual occupancy discounts of 60% for rehabilitation, 80% for livery

Note 2: Assumes Fixed Costs are 80% of Year 3 total in Year 1, 90% in Year 2 and include an additional rental value (£500) for additional land in Year 3

Note 3: see paragraph 4.6

4.21 In the initial year, as a customer base is being (re-)established, the profits from the yard are likely to be small, but will build as the business itself is established.

4.22 In terms of assessing the likely viability - and thus sustainability - of the business it is necessary to ensure the net profit (in Year 3) is sufficient to provide a reasonable return to the inputs deployed in the business - namely, land, labour and capital.

- a reasonable return to the owned land is considered the rental value of the land, say, £1,000 based on £500 per hectare;
- a reasonable return to labour is the minimum wage, presently approximately £20,800;
- and a reasonable return to capital is 2½ percent, which will equate to some £2,500 for a £100,000 investment in the infrastructure.

4.23 These total £24,300 and the business ought to be generating sufficient taxable profits to meet the above requirements by Year 3, and beyond. Indeed, by Year 3 there is sufficient surplus profit to finance the cost of constructing a permanent dwelling⁹.

4.24 Notwithstanding an unfortunate run of circumstances and the pandemic it is expected that a viable and sustainable business would have been established. This has not occurred – for the reasons outlined – but there is no reason to suppose that the applicant will not be able to establish a viable rural business at this location given another chance.

The functional need could not be fulfilled by any other means

4.25 It has been accepted previously that there are no dwellings on the holding, and no buildings suitable for conversion. The assessment of need has determined a need for a dwelling close to the stables and a dwelling in the village will not provide the necessary proximity to the horses. Even so, RAC is not aware of any other dwelling available in the locality which is suitable (in terms of size and cost) and available to meet the identified need.

It takes the form of a caravan, a wooden structure, or other temporary accommodation of the minimum size required to support the proposed new rural business activity

4.26 The application is for a caravan and meets the above requirement.

Suitable accommodation, including that which might have been converted, has not been sold separately from the land within the last five years.

4.27 No dwellings or buildings associated with the land have been sold, and no buildings suitable for conversion have been sold separately from the land within the last five years.

4.28 Finally, it is acknowledged that the Local Plan states:

“The council will not normally grant extensions to a temporary permission over a period of more than three years...”

However, the run of adverse health issues set out above, followed by the Covid-19 pandemic, is far from “normal” and the grant of a further permission would be considered a reasonable exception.

⁹ With an estimated cost of £100,000 this will cost £5,800 to finance at 4% over 30 years

5 Conclusion

- 5.1 This appraisal accompanies a planning application for the renewal of temporary permission for an essential rural worker's dwelling at “*Longacres*”, Winslow Road, Granborough, Buckinghamshire to enable the continued establishment of an equine rehabilitation and livery business.
- 5.2 In terms of the requirements of the Development Plan and the national planning guidance, it is concluded that
- (i) there is an essential need for a full-time rural worker to be available at the site at most times;
 - (ii) budgets indicate that the business could be profitable within three years; and,
 - (iii) the identified need cannot be fulfilled by another existing dwelling on the unit. The need requires the worker to live on the holding and there is no other existing suitable accommodation in the area that is sufficiently close to meet the functional needs of the enterprise.
- 5.3 The grant of a further temporary planning permission to allow staff to live on site and ensure the welfare of the livestock during the formation, development and establishment of a new rural enterprise is within Government guidance and is appropriate.
- 5.4 The run of adverse health issues followed by the pandemic is far from “normal” and the grant of a further permission is considered a reasonable exception.

